

STATE OF NEW YORK
SUPREME COURT : COUNTY OF NIAGARA

CW 1 Doe
By Cantor & Wolff LLC

SUMMONS

Plaintiff,

Index No.:

v.

JAMES WAKEFIELD
5779 Erna Drive
Lockport, New York 14094

Defendant.

TO THE ABOVE NAMED DEFENDANT(S):

YOU ARE HEREBY SUMMONED AND REQUIRED to serve upon the Plaintiff's attorney, Cantor & Wolff, at the address stated below, a written Answer to the attached Complaint.

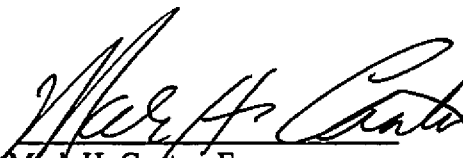
If this summons is served upon you within the State of New York by personal service you must respond within **TWENTY (20)** business days after service, not counting the day of service. If this Summons is not personally delivered to you within the State of New York, you must respond within **THIRTY (30)** days after service is completed, as provided by law.

If you do not respond to the attached Complaint within the applicable time limitation stated above, a Judgment will be entered against you, by default, for the relief demanded in the Complaint, without further notice to you.

This action is brought in the County of Niagara based on the residence of the Defendant.

Dated: Buffalo, New York
August 16, 2019

By:


Mark H. Cantor, Esq
Cantor & Wolff
Attorney for Plaintiff
2140 Main Place Tower
Buffalo, New York 14202
(716) 848-8000

STATE OF NEW YORK
SUPREME COURT : COUNTY OF NIAGARA

CW 1 Doe
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Plaintiff,

v.

JAMES WAKEFIELD

Defendant.

COMPLAINT

Index No.:

The plaintiff, CW 1 Doe, above named by her attorneys, Cantor & Wolff, as and for her
Complaint against the defendant herein alleges:

1. That at all times herein mentioned, Plaintiff, CW1 Doe, was and still is a resident of the State of New York
2. That upon information and belief, the Defendant, JAMES WAKEFIELD, was and still is a resident of the State of New York, and County of Niagara, residing at 5779 Erna Drive, Lockport, New York 14094.
3. That on the 8th day of September, 1983, the Plaintiff, was 8 years of age.
4. On the 8th day of September, 1983, at approximately 10:12 pm, the Defendant, JAMES WAKEFIELD, at or near 7721 Chestnut Ridge Road in the Town of Royalton, New York, admitted that at 7:30 pm, that same evening that " he pulled the pants down of the Plaintiff", then "I licked her pussy then I pulled up her pants and told her not to tell anyone what happen".(sic)
5. That what the Defendant, JAMES WAKEFIELD, admitted to did happen.

6. That Plaintiff, has been damaged in an amount of money that would exceed the jurisdictional limits of all lower courts, by virtue of this outrageous, vicious, vile, disgusting act when the Defendant was an adult which caused the Plaintiff grievous mental anguish.

7. That by reason of the foregoing Plaintiff is also entitled to punitive damages.

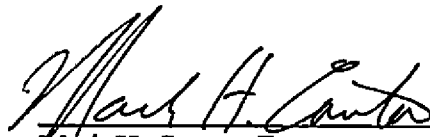
8. Plaintiff is entitled to bring this suit on account of the "Child victims Act" passed in February of 2019

9. That Article 16 of the CPLR does not apply to this action.

WHEREFORE, Plaintiff demands judgment against the Defendant in a sum of money which exceeds the jurisdictional limits of all lower courts together with the costs and disbursements of this action.

Dated: Buffalo, New York
August 16, 2019

By:



Mark H. Cantor, Esq
Cantor & Wolff
Attorney for Plaintiff
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Buffalo, New York 14202
(716) 848-8000